

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

Fansteel Metals, Inc.,

Plaintiff,

vs.

Case No.: 6:22-cv-00366-KEW

Citigroup Inc. and Union Carbide Corporation,

Defendant.

DISCLOSURE STATEMENT

"PARTY" DEFINED: Within this form, the terms "party" and "parties" refer to any party, intervenor, or proposed intervenor to this action.

Pursuant to Fed. R. Civ. P. 7.1:

Citigroup Inc.

[enter name of party on the line above]

who is a (check one) ☐ PLAINTIFF ☒ DEFENDANT ☐ OTHER: _____

in this action, makes the following disclosures:

INSTRUCTIONS:

1. Determine which part(s) of the form apply:
 - Part I is applicable only in diversity cases and must be completed by all parties.
 - Part II is applicable in all cases and must be completed by all nongovernmental parties that are not natural persons.
2. Check the applicable box or boxes, and fully provide any required information.
3. Attach separate pages as necessary to fully provide required information.

PART I

- ☐ This party is an individual who resides in _____.
- ☐ This party is a corporation incorporated in _____ and with a principal place of business in _____.
- ☐ This party is an unincorporated association or another artificial entity, including a limited liability company or limited liability partnership.

If yes, identify the nature of the entity, the members of the entity and the member's state of citizenship. If any member is other than an individual person, the required information identifying ownership interests and citizenship for each sub-member must be provided as well.

- ☐ This party is a trust.

If yes, identify each trustee and each trustee's state of citizenship. If any trustee is other than an individual person, the required information identifying ownership of the non-individual trustee and state of citizenship of each sub-trustee must be provided as well.

PART II

☒ This party is publicly held.

☐ This party has one or more parent entities.

If yes, identify all parent entities, including grandparent and great-grandparent entities.

☒ This party has one or more subsidiaries.

If yes, identify all subsidiaries. Citigroup Inc. has over 2,000 direct and indirect subsidiaries, none of which are publicly traded, and this information is no longer required per Fed. R. Civ. P 7.1 (a) (2) as this is not a diversity case; this is a federal question jurisdiction case.

☐ Ten percent or more of the stock of this party is owned by a publicly held corporation or other publicly held entity.

If yes, identify all such owners.

☐ Another association, firm, partnership, corporation, or other artificial entity related to the party—not already identified through other answers—has a direct financial interest in the outcome of the litigation.

If yes, identify all associations, firms, partnerships, corporations or other artificial entities and the nature of their interest.

☐ This party is a trade association.

If yes, identify all members of the association, their parent entities, and any publicly held companies that own ten percent or more of a member's stock.

☐ This party is a trust.

If yes, identify each trustee, their parent entities, and any publicly held companies that own ten percent or more of a trustee's stock.

Any additional pertinent information should also be provided on attached page(s).

DATED this 6th day of March, 2023.

Signature: s/Michael S. Linscott

Printed Name: Michael S. Linscott

Bar Number: OK 17266

Firm Name: DOERNER, SAUNDERS, DANIEL & ANDERSON

Address: 2 West Second Street, Suite 700
City, State, Zip Code: Tulsa, OK 74103
Phone/Fax: 918.582.1211/918.925.5288
Email Address: mlinscott@dsda.com

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2023 (Date), I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants (names only are sufficient):

Gary D. Justis
Ethan Sneed

I hereby certify that on _____ (Date), I served the same document by

- | | |
|--|---|
| <input type="checkbox"/> U.S. Postal Service | <input type="checkbox"/> In Person Delivery |
| <input type="checkbox"/> Courier Service | <input type="checkbox"/> E-Mail |

on the following, who are not registered participants of the ECF system:

Name(s) and Address(es):

s/Michael S. Linscott
Signature